

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
BEAUFORT DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

Case No. 9:21-cr-00778

ISAAC JIMENEZ-NAVA,

Defendant.

_____ /

MOTION RESERVING THE RIGHT TO FILE ADDITIONAL MOTIONS

COMES NOW the Defendant, Isaac Jimenez-Nava, by and through the undersigned attorney, to respectfully reserve the right to file additional motions as the progression of this case may merit. As grounds for this Motion, the Defendant shows as follows:

- 1) Discovery has not yet been provided, and the defense may be compelled to file formal motions with the Court as the case develops.
- 2) In analyzing and preparing the materials discovered and in the process of preparing a case of this nature, it may be necessary to file and entertain additional substantive motions.

WHEREFORE, so as to exercise the constitutional right to effective assistance of counsel, and pursuant to the cause requirement of Rule 12(f) of the Federal Rules of Criminal Procedure, the Defendant respectfully requests that this Court grant this Motion to allow the Defendant the right to file additional motions as the future progression of this case may merit.

Respectfully submitted,

/s/ Meredith D. McPhail

MEREDITH D. MCPHAIL

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DATED: December 3, 2021

CERTIFICATE OF SERVICE

I hereby certify that this pleading was electronically served upon counsel filed with the Clerk of Court using the ECF system that will notify the parties of record in this case.

/s/ Meredith D. McPhail
MEREDITH D. MCPHAIL
S.C. Federal Bar No. 13500

Counsel for Isaac Jimenez-Nava

DATED: December 3, 2021